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OFFICE OF THE
EXECUTIVE SECRETARY

Via Overnight Delivery

20 June 2002

Mr. David Waddell
Executive Secretary
Tennessee Regulatory Authority
460 James Robertson Parkway
Nashville, TN 37243

RE: Petition of Tennessee UNE-P Coalition to Open a Contested Case Proceeding to
Declare Switching an Unrestricted Unbundled Network Element, Docket No. 02-
00207

Dear Mr. Waddell:

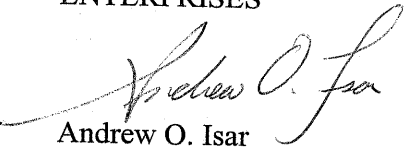
The Association of Communications Enterprises ("ASCENT"), hereby replies to BellSouth Telecommunications, Inc.'s ("BellSouth") June 11, 2002 *Response to Objections Raised by ASCENT* to BellSouth's first set of data requests. ASCENT respectfully requests the Commission reject BellSouth's objections and request that ASCENT be, for all intents and purposes, barred from participation in this docket absent compliance with onerous and irrelevant BellSouth data requests.

From the outset of this proceeding, BellSouth has endeavored to restrain ASCENT from its lawful right of participation in this docket. BellSouth now contends that, absent complete ASCENT disclosure of all requested member information, ASCENT is unable to form a viable opinion as to the desired outcome of issues in this docket. ASCENT does not need specific member data to understand general member concerns and interests, and defend those concerns, accordingly.

BellSouth is correct in its statement that ASCENT cannot produce what it does not possess nor control. However, BellSouth takes an unsupportable leap of logic in presuming that this translates to a general ASCENT inability to comment on the record and general issues raised in this proceeding. ASCENT, as a party to this proceeding, retains the ability to comment on evidence filed by other parties, including BellSouth, and offer perspective as to the general impact of such evidence on member business operations. BellSouth's arguments are overreaching and apparently designed solely to restrict ASCENT's participation, and should be rejected.

Sincerely,

ASSOCIATION OF COMMUNICATIONS
ENTERPRISES


Andrew O. Isar
Director - State Affairs

BEFORE THE TENNESSEE REGULATORY AUTHORITY
Nashville, Tennessee

In Re: *Petition of Tennessee UNE-P Coalition to Open a Contested Case Proceeding to Declare
an Unrestricted Unbundled Network Element*

Docket No. 02-00207

**OBJECTIONS OF THE ASSOCIATION OF COMMUNICATIONS ENTERPRISES TO
BELL SOUTH TELECOMMUNICATIONS, INC.'S FIRST SET OF DISCOVERY
REQUESTS**

CERTIFICATE OF SERVICE

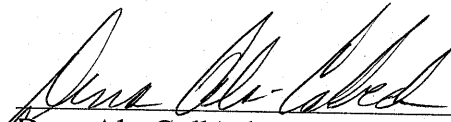
I hereby certify that on this day, June 20, 2002, I served the foregoing *Reply of the Association of Communications Enterprises to BellSouth Telecommunications, Inc.'s Response to Objections Raised by ASCENT*, postage prepaid, on the following known parties.

Via First Class Mail:

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